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CALIFORNIA TRIBAL FAMILIES COALITION

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Attorneys for Plaintiffs
Bear River Band of Rohnerville Rancheria Tribe and
Madison Fisher

(additional counsel on signature page)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

BEAR RIVER BAND OF ROHNERVILLE
RANCHERIA TRIBE, a federally recognized
Indian Tribe, and MADISON FISHER, an
individual,

Plaintiffs,

v.

CALIFORNIA DEPARTMENT OF SOCIAL
SERVICES; HUMBOLDT COUNTY;
HUMBOLDT COUNTY DEPARTMENT OF
HEALTH AND HUMAN SERVICES; KIM
JOHNSON (individually and in her official
capacity as Director of the California Department
of Social Services); CONNIE BECK (individually
and in her official capacity as Director of
Humboldt County's Department of Health and
Human Services); and DOES 1 through 25,
inclusive,

Defendants.

Case No. 4:23-cv-01809-HSG

**STIPULATED REQUEST TO EXTEND
DEADLINES AND CONTINUE TRIAL
DATE; ORDER**

Judge: The Honorable Haywood
S. Gilliam, Jr.

Trial Date: February 2, 2026
Action Filed: March 14, 2023

Plaintiffs Bear River Band of Rohnerville Rancheria Tribe and Madison Fisher (“Plaintiffs”) and Defendants California Department of Social Services, Humboldt County, Humboldt County Department of Health and Human Services, Kim Johnson, and Connie Beck (collectively “Defendants”), by and through their respective counsel, submit the following stipulated request to extend the case deadlines and continue the trial date:

WHEREAS, Defendants removed this case to this Court on April 13, 2023.

WHEREAS, on July 14, 2023, Plaintiffs filed a First Amended Complaint. ECF No. 23.

WHEREAS, on March 11, 2024, the Court granted in part and denied in part Defendants’ motions to dismiss Plaintiffs’ First Amended Complaint. ECF No. 52.

WHEREAS, on May 7, 2024, the Court ordered the parties to hold a mediation session by October 11, 2024. ECF No. 61.

WHEREAS, on July 18, 2024, the Court granted the parties’ joint stipulation to extend the mediation deadline from October 11, 2024, to January 10, 2025. ECF No. 75.

WHEREAS, on November 15, 2024, the Court granted the parties’ joint stipulation to extend deadlines and continue trial date and order (EFC No. 82), setting the following deadlines:

Event	Deadline
Mediation Deadline	April 30, 2025
Close of Fact Discovery	May 5, 2025
Exchange of Opening Expert Reports	May 20, 2025
Exchange of Rebuttal Expert Reports	June 23, 2025
Close of Expert Discovery	July 18, 2025
Dispositive Motion Hearing Deadline	October 9, 2025, at 2:00 p.m.
Pretrial Conference	January 13, 2026, at 3:00 p.m.
Jury Trial (10 days)	February 2, 2026, at 8:30 a.m.

WHEREAS, since that time, the parties have engaged in further discovery and several meet and confers regarding document production. Importantly, the parties also filed a further request for Plaintiff Madison Fisher’s unredacted juvenile case file with the Humboldt County Superior Court on February 4, 2025, which remains pending.

WHEREAS, on March 17, 2025, the parties participated in a phone conference. During that call, the parties jointly agreed that, because additional time is needed for the parties to produce and review the documents necessary to engage in effective mediation, and for the Humboldt County Superior Court to produce Plaintiff Fisher's complete juvenile case file, which is integral to the claims in this case, it is in the parties' best interest to postpone mediation, extend deadlines, and continue the trial date.

WHEREAS, for the sake of efficiency and to promote the potential for early resolution, counsel for the parties agree that a six-month extension of the case deadlines is warranted to allow the parties to focus their efforts on exploring a mediated resolution of this matter before expending additional time and resources on dispositive motion practice and trial. The parties seek this six-month extension with the goal of avoiding further requests to extend the case deadlines.

NOW, THEREFORE, IT IS HEREBY REQUESTED that the Court continue all current deadlines by six (6) months as follows:

Event	Proposed Deadline
Mediation Deadline	October 30, 2025
Close of Fact Discovery	November 5, 2025
Exchange of Opening Expert Reports	November 20, 2025
Exchange of Rebuttal Expert Reports	December 23, 2025
Close of Expert Discovery	January 19, 2026
Dispositive Motion Hearing Deadline	April 9, 2026, at 2:00 p.m.
Pretrial Conference	July 14, 2026, at 3:00 p.m.
Jury Trial (10 days)	August 3, 2026, at 8:30 a.m.

Dated: March 21, 2025

By: /s/ Kate T. Spelman

Kate T. Spelman

Todd C. Toral

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*Attorney for Plaintiffs Bear River Band of Rohnerville
Rancheria Tribe and Madison Fisher*

Dated: March 21, 2025

By: /s/ Joshua Sondheimer

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Rob Bonta
Attorney General of California

*Attorneys for Defendants California Department of
Social Services and Kim Johnson, CDSS Director*

Dated: March 21, 2025

By: /s/ Jeremy Sugerman

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County Department of Health and Human Services; and
Connie Beck, in her official capacity as Director of
Humboldt County's Department of Health and Human
Services*

PURSUANT TO THIS STIPULATED REQUEST, IT IS SO ORDERED.

DATED: 3/25/2025



Hon. Haywood S. Gilliam, Jr.